

ONTARIO
SUPERIOR COURT OF JUSTICE

B E T W E E N:

ZEXI LI

Plaintiff/Moving Party

and

CHRIS BARBER, BENJAMIN DICHTER, TAMARA LICH, PATRICK KING and
JOHN DOE 1, JOHN DOE 2, JOHN DOE 3, JOHN DOE 4, JOHN DOE 5,
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JOHN DOE 56, JOHN DOE 57, JOHN DOE 58, JOHN DOE 59 and JOHN DOE 60

Defendants/Responding Parties

Proceeding under the *Class Proceedings Act, 1992*

AFFIDAVIT OF ZEXI LI

I, Zexi Li, of the City of Ottawa, in the Province of Ontario, MAKE OATH AND SAY:

1. I am the representative Plaintiff in this proposed class proceeding, and, as such, have personal knowledge of the matters to which I hereinafter depose. Where I have made statements based on information and belief, I have stated the source of the information and believe it to be true.

Amended Claim to be Issued

2. The current Statement of Claim in this proceeding was issued on February 4, 2022 (the “**Claim**”)

3. The Claim is being amended to include:

- (a) Additional representative plaintiffs representing a “business class” and an “employee class” of affected persons;
- (b) Additional defendants engaged in organizing and supporting the Freedom Convoy protest (the “**Proposed Defendants**”);
- (c) Additional claims against the defendants in public and private nuisance relating to the obstruction of public highways, as well as air quality and noise pollution; and
- (d) Additional claims for damages, as follows:
 - (i) General damages for pain, suffering and psychological distress in the amount of \$36 million;
 - (ii) Special damages for business losses in the amount of \$200 million;
 - (iii) Special damages for lost wages in the amount of \$60 million;
 - (iv) Punitive damages in the amount of \$10 million.

4. Given the urgency of this motion, I have not had time to issue an Amended Statement of Claim. A draft Amended Statement of Claim will be included in the Motion Record for this motion.

The Need for a *Mareva* Injunction

5. On February 4, 2022, I brought an injunction on behalf of the resident Class¹ and myself to prohibit the Defendants, or any other participant in the Freedom Convoy protest, from using vehicle horns in downtown Ottawa, ON (the “**Honking Injunction**”).

6. In support of the Honking Injunction, I swore an affidavit dated February 4, 2022 testifying that since the arrival of the Freedom Convoy in downtown Ottawa, and until the granting of the Honking Injunction, I had been experiencing severe mental distress, suffering, and torment as a result of persistent loud noise emanating from trucks honking outside my residence over the course of ten days. Further, I could not leave my house without being heckled by Freedom Convoy participants and called the police on 14 occasions to ask for their assistance. A copy of my Affidavit sworn February 4, 2022 is attached as **Exhibit “A”**.

7. After the Honking Injunction was issued, participants in the Freedom Convoy temporarily restricted their honking to certain times. However, the participants have since resumed loud honking at all times of day and into the night. They have also continued to occupy the roads and sidewalks of downtown Ottawa with idling vehicles and semi-permanent encampments.

8. Since the Freedom Convoy arrived in downtown Ottawa, I have been experiencing severe mental distress, suffering and torment as a result of persistent and loud honking from several large

¹ The proposed subclasses are defined in the draft Amended Statement of Claim as: The Resident Subclass—“all persons who reside within the Occupation Zone in downtown Ottawa, excluding those who contributed to and/or actively supported the Convoy Protest, hereinafter known as the Resident Subclass”; the Business Subclass—“all businesses that operate within the Occupation Zone in downtown Ottawa and experienced business losses due to tortious behaviour of the Defendants, excluding those who contributed to and/or actively supported the Convoy Protest; and the Employee Subclass—“all persons who work as employees within the Occupation Zone in downtown Ottawa and experienced wage loss due to the tortious behaviour of the Defendants, excluding those who contributed to and/or actively supported the Convoy Protest.”

trucks which have been camped outside of my residence. Diesel fumes from hundreds of idling vehicles have polluted the air outside. Loud and aggressive demonstrators and parked vehicles have blocked access to sidewalks and roadways.

9. Local businesses have closed or reduced hours at times during the occupation, including the two main grocery stores located in downtown Ottawa during the weekend of February 12/13, 2022.

10. The City of Ottawa continues to warn residents to avoid non-essential travel in or around the downtown core. As a resident, this means that I am unable to leave my home except when it cannot be avoided to obtain necessities. I am also frightened of being harassed by the participants crowding the road and sidewalks, many of whom are loud and aggressive.

11. The Freedom Convoy has set up a number of amenities for the participants, including port-a-potties, free food and drink stations, and performance spaces. I have also witnessed many supporters carrying jerry cans of fuel to idling vehicles and delivering firewood to makeshift outdoor kitchens and firepits in downtown Ottawa.

12. The number of demonstrators tends to increase over the weekend. On Saturday, February 12, 2022, the Ottawa Police estimated that over 4,000 demonstrators were present, creating serious safety concerns arising from aggressive, illegal behaviour by many protestors. A copy of a press release from the Ottawa Police Service dated February 12, 2022 is attached as **Exhibit "B"**.

13. On February 14, 2022, Prime Minister Trudeau announced that the Emergencies Act would be invoked to give the federal government extra powers to handle ongoing protests against

pandemic restrictions. I do not know what, if any impact, that will have on the protest. A copy of the CBC News article dated February 14, 2022 is attached as **Exhibit “C”**.

Undertaking as to Damages

14. I am advised by my counsel that parties bringing an injunction are typically required to pay an undertaking as to damages. I am requesting that I be relieved of this obligation.

15. I am bringing this injunction in the public interest, on behalf of the putative Class and myself. As described above, the livelihood of thousands of Ottawans is being affected as we continue to suffer severe mental, physical, and financial distress as a result of the Freedom Convoy participants’ behaviour. Many local businesses are also suffering financially as they cannot open or operate for fear of vandalism, destruction, or harassment of their employees. We are seeking this injunction to allow the Class to live peacefully and without fear for their safety and security.

16. I do not have any assets to satisfy such an undertaking, which I understand could be in the tens or hundreds of thousands of dollars. If the Court were to require an undertaking as to damages from me, it would defeat my ability to seek this *Mareva* injunction on behalf of the Class.

Regular Service is Impractical

17. I am also advised by my counsel that the *Rules of Civil Procedure* require service of the court documents on the Defendants unless it is impractical to do so.

18. While the Defendants who have already been named in this proceeding are represented by counsel, Keith Wilson, it would be impractical and disproportionately costly to effect regular

service of court documents on the Proposed Defendants, as their location, email addresses, and/or identities is unknown.

19. A corporate search indicates that several of the Proposed Defendants are directors of the proposed corporate Defendant Freedom 2022 Human Rights and Freedoms (“**Freedom 2022**”). The corporate address of Freedom 2022 is 1493 Leeds and Grenville 2, Mallorytown, ON K0E 1R0. Freedom 2022 is represented by corporate counsel, Alan G. Warnock. Mr. Warnock is a partner at Warnock Kraft Anderson LLP located at 225-1 Avenue NW, Airdrie, Alberta T4B 2M8. A copy of Form 4006 Changes Regarding Directors is attached as **Exhibit “D”**.

20. I believe that if we send court documents to Mr. Wilson and Mr. Warnock, it will come to the attention of the Defendants who have been previously named and those Defendants who are directors of Freedom 2022.

21. Some of the Defendants are key organizers of the Freedom Convoy. They come from all across Canada. They are currently on-the-ground in Ottawa to assist with the planning of the Freedom Convoy. I am advised by my counsel that we have made attempts to find the Defendants’ contact information but have not yet been successful. As of the time I am swearing this Affidavit, we do not have the following contact information:

- (a) The Proposed Defendants’ location within Ottawa and whether they plan to leave Ottawa;
- (b) The Proposed Defendants’ home addresses; or
- (c) The Proposed Defendants’ email addresses.

22. We do know, however, that many of the Proposed Defendants are active on one or more social media platforms. The Affidavit of Jeremy King outlines the Proposed Defendants' various social media accounts and the ways they have used social media to provide frequent updates and instructions to the Freedom Convoy participants. The relevant social media accounts include:

(a) Tamara Lich

(i) Twitter – @Tamara_MVC

(ii) TikTok – tamaralich

(b) Chris Barber

(i) TikTok – various accounts, including @chrisbarber1691 and @bigred19755

(c) Benjamin Dichter

(i) Twitter - @BJDichter

(d) Patrick King

(i) Facebook – The Real Pat King

(ii) Instagram – @real_patrick_king

(e) Daniel Bulford

(i) Twitter - @BulfordDaniel

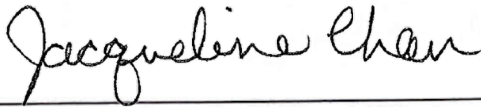
(f) Chad Eros

- (i) LinkedIn – Chad Eros
- (g) Joe Jansen
 - (i) Twitter - @joejansen1
- (h) Jason LaFace
 - (i) LinkedIn – Jason LaFace
- (i) Tom Marazzo
 - (i) LinkedIn – Tom Marazzo
- (j) Sean Tiessen
 - (i) LinkedIn – Sean Tiessen
- (k) @Nobody Caribou
 - (i) Twitter – @NobodyCaribou

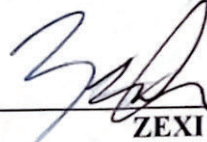
23. I believe that given the Proposed Defendants' prevalent presence on social media and their reliance on these social media accounts to communicate with the Freedom Convoy participants and other Defendants, if we send court documents to the social media accounts listed above, it is likely that it will come to the attention of the Proposed Defendants.

24. I swear this affidavit in support of the motion for injunctive relief and for no other improper purpose.

SWORN by Zexi Li of the City of Ottawa, in
in the Province of Ontario, before me at the
City of Toronto, in the Province of Ontario, on
February 14, 2022 in accordance with
O. Reg. 431/20, Administering Oath or
Declaration Remotely.

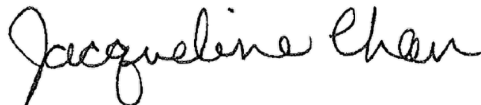


Commissioner for Taking Affidavits
(or as may be)



ZEXI LI

This is Exhibit “A” referred to in the Affidavit of Zexi Li sworn by Zexi Li of the City of Ottawa, in the Province of Ontario, before me at the City of Toronto, in the Province of Ontario, on February 14, 2022 in accordance with O. Reg. 431/20, Administering Oath or Declaration Remotely.

A handwritten signature in black ink that reads "Jacqueline Chan". The signature is fluid and cursive, with the first letter of each name being capitalized and prominent.

Commissioner for Taking Affidavits (or as may be)

JACQUELINE CHAN

**ONTARIO
SUPERIOR COURT OF JUSTICE**

B E T W E E N:

ZEXI LI

Plaintiff/Moving Party

- and -

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Defendants/Responding Parties

Proceeding under the *Class Proceedings Act, 1992*

AFFIDAVIT OF ZEXI LI

I, ZEXI LI, of the City of Ottawa, in the Province of Ontario, AFFIRM:

1. I am the representative Plaintiff in this proposed class action and the moving party in this motion. As such, I have personal knowledge of the matters to which

I hereinafter depose except where I have stated my evidence to be on information and belief, in which case I have indicated the source of my information and my belief in the truth of the information.

2. I reside in the Centretown neighbourhood in the heart of downtown Ottawa. I first moved to Ottawa to pursue my post-secondary education at the University of Ottawa in the fall of 2017. In the course of my studies, I fell in love with the city and, in particular, the vibrant, multi-cultural community in which I currently reside.
3. I am informed by my review of the Ottawa Neighbourhood Study undertaken by the University of Ottawa and do believe that the population of Centretown is in the range of approximately 28,000 residents. I would estimate based on that number that there are approximately 5,000 to 6,000 residents in the vicinity of where I live, within a six block radius of Parliament Hill.
4. Since Friday, January 28, 2022 I have been experiencing severe mental distress, suffering and torment as a result of persistent and loud honking from several large trucks which have been camped outside of my residence as a part of a so-called Freedom Convoy (the "Convoy"). I understand from media reports that the Convoy is comprised of people who have converged on Ottawa to express their political opposition to COVID-19 public health measures.
5. While some of the honking sounds are from regular sized motor vehicle horns, the loudest and most persistent honks have come from large transport trucks. Some of these trucks are equipped with horns which emit loud honking noises

typical of vehicles of their size. A number of the trucks are equipped with horns which are similar in tone and volume to train horns. The train horns are as loud if not louder than anything I have ever heard.

6. From within my apartment, I have been inundated with the sounds of honking horns, including train-type horns, from morning to night, sometimes as late as 1:30 am. With the exception of some short periods of reprieve late in the night, the sound feels like it's nearly constant.
7. I downloaded an application on my mobile phone called Decibel X which measures sound levels. When the sounds of honking horns are at their peak, Decibel X has recorded sound levels as high as 84 decibels within my apartment.
8. I cannot overstate the extent to which the honking horns are affecting me emotionally. My nerves are frayed. I can't sleep. I don't feel the usual sense of peace, safety and serenity which I usually feel when I'm at home. During the brief periods when the sound of honking horns subsides, I can't even enjoy the moment of relative quiet because I become riddled with anxious anticipation for the moment it will start up again. Waiting for the next honk is almost as unbearable as the sound of the horns.
9. I have not had a restful night's sleep since the Convoy descended on my community. The only way I can fall asleep and temporarily escape the noise is by playing music on external speakers at 70%-80% volume and inserting noise-cancelling earphones or earplugs into my ears.

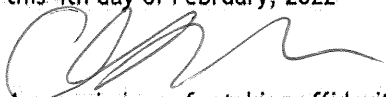
10. I am scared to go outside but I do venture out when necessary. Before leaving my residence, I insert noise-cancelling headphones into my ears. Nonetheless, the sound of honking horns is almost unbearable. I can physically feel the noise vibrating inside my ears.
11. When I do get up the courage to leave my apartment, I am almost immediately subjected to heckling my members of the Convoy who yell at me to remove the mask I wear to protect myself and others from contracting COVID-19. If I ignore the heckles, members of the Convoy respond by honking their horns at me. In response to the horns being honked in such close proximity to me I almost invariably flinch, causing the members of the convoy to cheer loudly and laugh at my expense. I have never felt so unsafe or demoralized in my neighbourhood.
12. Since Friday January 28, 2022, I have contacted the Ottawa Police Service on approximately 14 occasions to complain about the noise and the distress it is causing me, either by phone or by approaching officers on the street near my home. In response to my calls for help I have either been told that there is nothing that can be done or that the officers on the ground will address the issue but the noise continues unabated. The fact that the police are apparently impotent to enforce basic order in my neighbourhood, in a context where I feel that I and others are being actively harmed, is making me even more anxious and fearful.

- 5 -

13. I love my community so much and am proud to live here. I am heartbroken by the trauma that is being inflicted on me and my neighbours and by being made to feel like a prisoner in my own home by people who claim to stand for freedom.

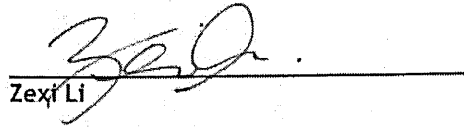
14. I make this affidavit in good faith and for no improper purpose.

SWORN before me remotely)
 in accordance with O. Reg 431/20)
 by videoconference between)
 Ottawa, ON (commissioner))
 and Ottawa, ON (affiant))
 this 4th day of February, 2022)



A commissioner for taking affidavits

Christine Johnson
Chang & Associates



Zexi Li

ONTARIO
SUPERIOR COURT OF JUSTICE

Proceeding commenced at
Ottawa

AFFIDAVIT OF ZEXI LI

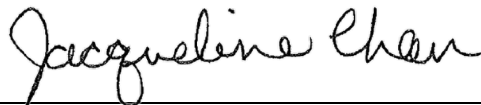
CHAMP AND ASSOCIATES
43 Florence Street
Ottawa, ON K2P 0W6

Paul Champ
LSO 45305K

Tel: 613 237-4740
Fax: 613 232-2680
pchamp@champlaw.ca

Solicitors for the Applicant

This is Exhibit “B” referred to in the Affidavit of Zexi Li sworn by Zexi Li of the City of Ottawa, in the Province of Ontario, before me at the City of Toronto, in the Province of Ontario, on February 14, 2022 in accordance with O. Reg. 431/20, Administering Oath or Declaration Remotely.

A handwritten signature in black ink that reads "Jacqueline Chan". The signature is fluid and cursive, with the first letters of each name being capitalized and prominent.

Commissioner for Taking Affidavits (or as may be)

JACQUELINE CHAN



OTTAWA POLICE SERVICE
SERVICE DE POLICE D'OTTAWA
A Trusted Partner in Community Safety
Un partenaire fiable de la sécurité communautaire

Feedback

Ottawa Police Service Establish Integrated Command Centre to Coordinate Enforcement

Posted On Saturday February 12, 2022

Like 62

Tweet



Subscribe

FOR IMMEDIATE RELEASE: Saturday, February 12, 2022 8:12pm

(Ottawa) – Together with the OPP and the RCMP, the Ottawa Police Service today announced the establishment of an enhanced, Integrated Command Centre (ICC) in response to a significant influx of demonstrators into the Ottawa area and escalation of the current occupation.

In downtown Ottawa, over 4,000 demonstrators were present throughout the day. Safety concerns - arising from aggressive, illegal behaviour by many demonstrators - limited police enforcement capabilities.

We expect that the ICC will result in a significantly enhanced ability of our police service to respond to the current situation in our city. The ICC will allow us to make the most effective use of the additional resources our policing partners have provided to us.

In addition to the establishment of the ICC, the Ottawa Police Service provides the following update on operations for today:

- Due to the volume of people and vehicles in the downtown core, police safely managed the movement of various convoys in and around Ottawa. One 300 vehicle convoy and a 20-kilometer long car convoy from Quebec were safely managed.
- Interception of a fuel transport into the downtown core.
- Operationalization of the new measures announced by the Ontario Government yesterday.
- Continued planning with all levels of government to bring an end to the current occupation.

The Ottawa Police Service will continue to provide additional operational updates as appropriate.

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CONTACT:

Media Relations Section

Tel: 613-236-1222, ext. 5366

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Contact Us

Ottawa Police Service

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Email Us

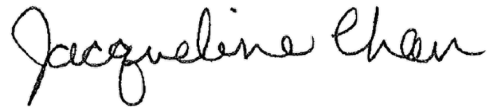
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Ottawa Police Service P.O. Box 9634 Station T, Ottawa, Ontario, K1G 6H5, T: 613-236-1222, *TTY service for the deaf, deafened and hard of hearing: 613-232-1123*

Design by eSolutionsGroup (<http://www.esolutionsgroup.ca>).

This is Exhibit “C” referred to in the Affidavit of Zexi Li sworn by Zexi Li of the City of Ottawa, in the Province of Ontario, before me at the City of Toronto, in the Province of Ontario, on February 14, 2022 in accordance with O. Reg. 431/20, Administering Oath or Declaration Remotely.

A handwritten signature in black ink that reads "Jacqueline Chan". The signature is fluid and cursive, with the first letters of each word being capitalized and prominent.

Commissioner for Taking Affidavits (or as may be)

JACQUELINE CHAN

Politics · Updated

Federal government invokes Emergencies Act for first time ever in response to protests

Act grants cabinet ability to take 'special temporary measures that may not be appropriate in normal times'

[Catharine Tunney](#) · CBC News · Posted: Feb 14, 2022 7:54 AM ET | Last Updated: 7 minutes ago



CBC News Special: PM Invokes Emergencies Act

53 minutes ago | **LIVE**

Join CBC News live for special coverage starting at 4 p.m. ET Monday as Prime Minister Justin Trudeau and federal ministers hold a press conference to announce they will invoke

the Emergencies Act to give the federal government extra powers to handle anti-vaccine mandate protests across the country. 0:00

[comments](#)



Prime Minister Justin Trudeau says he has invoked the Emergencies Act for the first in time in Canada's history to give the federal government extra powers to handle ongoing protests against pandemic restrictions.

This is a breaking story. A previous version is below.

Prime Minister Justin Trudeau has told his caucus he will invoke the never-before-used Emergencies Act to give the federal government extra powers to handle anti-vaccine mandate protests, sources say.

Those sources, who were not authorized to speak publicly, said the prime minister informed the premiers of his decision this morning.

The Emergencies Act, which replaced the War Measures Act in the 1980s, defines a national emergency as a temporary "urgent and critical situation" that "seriously endangers the lives, health or safety of Canadians and is of such proportions or nature as to exceed the capacity or authority of a province to deal with it."

Trudeau is expected to explain his decision during a news conference at 4:30 p.m. ET. CBC News will carry it live.

The act gives special powers to respond to emergency scenarios affecting public welfare (natural disasters, disease outbreaks), public order (civil unrest), international emergencies or war emergencies.

- [Mounties seize guns and arrest 11 protesters at border blockade in Alberta](#)
- [Ambassador Bridge reopens with heavy police presence around former Windsor, Ont., protest site](#)

It grants cabinet the ability to "take special temporary measures that may not be appropriate in normal times" to cope with an "urgent and critical situation" and the resulting fallout. It is still

subject to the protections of the Charter of Rights and Freedoms.

WATCH | Use of Emergencies Act 'proof of failure of leadership,' says NDP leader:



Use of Emergencies Act 'proof of failure of leadership,' says NDP leader

5 hours ago | 2:04

Jagmeet Singh says he will support the move to use the Emergencies Act to deal with ongoing convoy protests, but hopes more concrete changes will be made to ensure this doesn't happen again in the future. 2:04

Ottawa police have said they are outnumbered by crowds protesting vaccine mandates in the capital. Despite a provincial state of emergency, protesters ignored the threat of arrest and jail time and flocked to the city's centre over the weekend.

Demonstrators have erected tents, a stage, a large video screen and even a hot tub on various streets — including Wellington Street, which runs in front of the Parliament Buildings and the Prime Minister's Office.

Ottawa police said "safety concerns" — including "aggressive, illegal behaviour" by demonstrators — are to blame for the "limited police enforcement capabilities."

A blockade of the Ambassador Bridge in Windsor, Ont., a key supply link between Canada and the U.S., was dispersed by police earlier Sunday, with 12 arrests.

Once cabinet declares an emergency, it takes effect right away — but the government still needs to go to Parliament within seven days to get approval. If either the Commons or the Senate votes against the motion, the emergency declaration is revoked.

NDP Leader Jagmeet Singh said Monday that while he sees the prime minister's decision to turn to the Emergencies Act as "proof of a failure of leadership," he will support the declaration — which should secure its passage through a minority Parliament.

WATCH / Experts disagree about invoking federal Emergencies Act:



Security experts disagree on use of federal Emergencies Act

3 hours ago | 7:44

National security expert Wesley Wark says Ottawa's expected use of the federal Emergencies Act is 'long overdue' to help end the protests in Ottawa. But Leah West, assistant professor of international affairs at Carleton University in Ottawa, says Ontario's own emergency act gives it the power it needs to remove protesters. 7:44

"The reason why we got to this point is because the prime minister let the siege in Ottawa go on for weeks and weeks without actually doing anything about it, allowed the convoy to shut down borders without responding appropriately," he said.

Conservative MP Pierre Poilievre — the only person so far running to lead his party — said he supports peaceful protests but not blockades.

"You know how we can put an end to both of them? Real simple. Listen to the science, do what other provinces and countries are doing, that is to end the mandates and restrictions so protesters can get back to their lives and their jobs," he said heading into question period Monday.

"The only emergency is the one that Justin Trudeau has deliberately created to divide the country and gain politically."

Legal threshold questioned

Jack Lindsay, an associate professor in the applied disaster and emergency studies department at Brandon University in Manitoba, said one of the first steps in invoking the Emergencies Act is the government showing that a state of emergency exists.

"They're gonna have to basically prove that first hurdle, that it is a national emergency," he said.

"He's basically going to be arguing that these truckers are basically creating a threat to the security of Canada."

Leah West, an assistant professor in international studies at Carleton University who has published a book on national security law, questions whether that threshold has been met.

A protester who arrived to support convoy participants blocked by local residents in a counter protest on Riverside Drive argues with police officers, on the 17th day of a protest against COVID-19 measures that has grown into a broader anti-government protest, in Ottawa, Sunday, Feb. 13, 2022. (Justin Tang/The Canadian Press)

"To invoke a national emergency, the government would need to be saying that these protests threaten the security of Canada, our sovereignty or our territorial integrity," she said.

"I have real concerns about fudging the legal thresholds to invoke the most powerful federal law that we have."

Errol Mendes, a professor of constitutional and international law at the University of Ottawa, sees it differently.

"If you look at what's happened not just in Ottawa but at the Ambassador Bridge and Coutts, Alta. and in B.C., essentially we have a national emergency," he told CBC News Network.

"You have this small group basically asking the government to do whatever they want. That's the national security problem."

Limits on public assembly and travel possible

Under the act, the government is prohibited from taking direct control of police forces, said Lindsay.

"They do have the grounds to regulate and prohibit public assembly and travel and then regulate or prohibit the use of specific properties," he said.

"I suppose they could put out regulations about where semi-trailers are allowed to park overnight, for example. They can designate protected places, like the Ambassador Bridge or something."

- [Opportunity to end convoy protest peacefully is slipping away, experts say](https://www.cbc.ca/news/politics/trudeau-premiers-cabinet-1.6350734)

- [Government considering emergency powers with 'appropriate caution,' federal minister says](#)

The government also can order or direct any person to render services with compensation, said Lindsay. That power could in theory be used to tow trucks blocking streets downtown.

In a meeting with the Liberal caucus on Monday morning, Trudeau said there were no plans to deploy the military, according to the sources.

Kenney worries about inflaming protesters

Speaking before his call with Trudeau, Ontario Premier Doug Ford gave his initial approval.

"I support the federal government and any proposal they have to bring law and order back to our province, to make sure we stabilize our business and trade around the world," he told a news conference.

WATCH / Protesters blocked multiple border crossings across Canada over the weekend:



Protesters block border crossings across Canada

19 hours ago | 2:51

Protesters blocked multiple border crossings across Canada over the weekend, and while some have reopened, they're still closed in Surrey, B.C., and Coutts, Alta. 2:51

Alberta Premier Jason Kenney, who has been dealing with a blockade at the border crossing in Coutts protesting against pandemic restrictions, said he doesn't believe invoking the act is necessary in his province.

The RCMP announced Monday its officers arrested 11 people after searching three trailers and finding weapons at the protests in southern Alberta.

"We have the legal powers that we need. We have the operational resources that we need to enforce, and I think at this point for the federal government to reach in over top of us without offering anything in particular would frankly be unhelpful," said Kenney.

A protester holds a hockey stick wrapped in a Canadian flag above his head, Monday, Feb. 14, 2022 in Ottawa. The protesters are decrying federal vaccine mandates and provincial COVID-19 restrictions aimed at slowing the spread of the virus, some of which are being rolled back by provinces. (Adrian Wyld/The Canadian Press)

"I am concerned that there's a certain kind of person that if the federal government proceeds with this, who will be further inflamed and that could lead to prolongation of some of these protests."

The premiers of Manitoba, Saskatchewan and Quebec also expressed concerns about invoking the act.

- **UPDATED** [Francois Legault says Trudeau's invoking of Emergencies Act 'not necessary' in Quebec](#)
- [Sask. Premier says Emergencies Act should only be invoked in provinces that request it](#)

Invoking the act also triggers an inquiry at the end of the declaration.

The War Measures Act was most famously used in peacetime by Prime Minister Pierre Elliott Trudeau during the October Crisis.

CBC News Special Coverage

Prime Minister Justin Trudeau discusses his decision to invoke the Emergencies Act. Here's how to follow our special coverage

- CBC News Chief Political Correspondent Rosemary Barton and breaking news teams across the country bring you special coverage starting at 4 p.m. ET on CBC News Network and at 4:30 p.m. ET on CBC-TV and livestreaming on [CBC Gem](#), [CBC.ca](#) and the CBC News app.
- Susan Bonner and Piya Chattopadhyay host live coverage on CBC Radio beginning at 4:30 ET, or listen on the CBC Listen app.
- News and analysis will continue on CBC News Network with *Power & Politics* and *Canada Tonight*, and on *The World at 6* on CBC Radio One and the CBC Listen app.
- Watch *The National* starting at 9 p.m. ET on CBC News Network throughout the evening for the latest news and analysis.
- And follow [cbcnews.ca](#) for breaking news, analysis and updates.

Corrections

- This story has been updated from a previous version that said the prime minister is chairing a cabinet meeting. In fact, it is a caucus meeting.

Feb 14, 2022 8:38 AM ET

With files from David Cochrane and JP Tasker

Your weekly guide to what you need to know about federal politics and the minority Liberal government. Get the latest news and sharp analysis delivered to your inbox every Sunday morning.

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This is Exhibit “D” referred to in the Affidavit of Zexi Li sworn by Zexi Li of the City of Ottawa, in the Province of Ontario, before me at the City of Toronto, in the Province of Ontario, on February 14, 2022 in accordance with O. Reg. 431/20, Administering Oath or Declaration Remotely.

A handwritten signature in black ink that reads "Jacqueline Chan". The signature is fluid and cursive, with the first letters of each name being capitalized and prominent.

Commissioner for Taking Affidavits (or as may be)

JACQUELINE CHAN



Form 4006
Changes Regarding Directors
Canada Not-for-profit Corporations Act
(NFP Act)

Formulaire 4006
Changements concernant les
administrateurs
Loi canadienne sur les organisations à but
non lucratif (Loi BNL)

Received Date (YYYY-MM-DD): 2022-02-08
Date de réception (AAAA-MM-JJ):

1 Corporate name
Dénomination de l'organisation
Freedom 2022 Human Rights and Freedoms

2 Corporation number
Numéro d'organisation
1372685-1

3 Board of Directors (**new directors in bold**)
Conseil d'administration (**les nouveaux administrateurs sont indiqués en caractère gras**)
See attached schedule / Voir l'annexe ci-jointe

4 The following individuals are no longer directors:
Les individus suivants ne sont plus administrateurs :
Name End Date YYYY-MM-DD
Nom Date de fin de mandat AAAA-MM-DD

5 Declaration: I certify that I have relevant knowledge of the corporation and that I am authorized to sign this form.
Déclaration: J'atteste que je possède une connaissance suffisante de l'organisation et que je suis autorisé à signer ce formulaire.

Original signed by / Original signé par
Alan G. Warnock

Alan G. Warnock
403-948-0009

A person who makes, or assists in making, a false or misleading statement is guilty of an offence and liable on summary conviction to a fine of not more than \$5,000 or to imprisonment for a term of not more than six months or to both (subsection 262(2) of the NFP Act).

La personne qui fait une déclaration fautive ou trompeuse, ou qui aide une personne à faire une telle déclaration, commet une infraction et encourt, sur déclaration de culpabilité par procédure sommaire, une amende maximale de 5 000 \$ et un emprisonnement maximal de six mois ou l'une de ces peines (paragraphe 262(2) de la Loi BNL).

You are providing information required by the NFP Act. Note that both the NFP Act and the *Privacy Act* allow this information to be disclosed to the public. It will be stored in personal information bank number IC/PPU-049

Vous fournissez des renseignements exigés par la Loi BNL. Il est à noter que la Loi BNL et la *Loi sur les renseignements personnels* permettent que de tels renseignements soient divulgués au public. Ils seront stockés dans la banque de renseignements personnels numéro IC/PPU-049.

Schedule
Board of Directors (new directors in bold)

Name	Start Date YYYY-MM-DD	Address
Chad Eros	2022-01-30	62 Elisia Drive, Moose Jaw SK S6J 1K9, Canada
Miranda Gasinor	2022-02-03	225 First Avenue NW, Airdrie AB T4B 2M8, Canada
Sean Tiessen	2022-02-03	225 First Avenue NW, Airdrie AB T4B 2M8, Canada
Tamara Lich	2022-02-03	225 First Avenue NW, Airdrie AB T4B 2M8, Canada
Chris Barber	2022-02-03	225 First Avenue NW, Airdrie AB T4B 2M8, Canada
Chris Garrah	2022-01-30	1493 County Road 2, Mallorytown ON K0E 1R0, Canada
Benjamin Dichter	2022-02-03	225 First Avenue NW, Airdrie AB T4B 2M8, Canada

ZEXI LI.
Plaintiff (Moving Party)

-and- CHRIS BARBER et al.
Defendants (Responding Parties)

Court File No. CV-22-00088514-00CP

ONTARIO
SUPERIOR COURT OF JUSTICE
PROCEEDING COMMENCED AT OTTAWA

AFFIDAVIT OF ZEXI LI

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Acting as Agent to Champ & Associates, Counsel for
the Plaintiff, Zexi Li